

"UNDER SEAL"

FILED
Charlotte, NC

APR 19 2022

IN THE UNITED STATES DISTRICT COURT Clerk, US District Court
FOR THE WESTERN DISTRICT OF NORTH CAROLINA Western District NC
CHARLOTTE DIVISION

UNITED STATES OF AMERICA)

DOCKET NO. 3:22-cr-98-FDW

v.)

BILL OF INDICTMENT

Violations: 18 U.S.C. § 922(a)(1)(A)

18 U.S.C. § 922(o)

26 U.S.C. § 5861(a)

DESMON TAYLOR MOORE)

26 U.S.C. § 5861(d)

18 U.S.C. § 2

THE GRAND JURY CHARGES:

COUNT ONE

(Dealing and Manufacturing Firearms Without a License)

From in or about 2021 until on or about March 1, 2022, in Mecklenburg County, within the Western District of North Carolina, the defendant,

DESMON TAYLOR MOORE,

not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of manufacturing and dealing in firearms, in violation of Title 18, United States Code, Section 922(a)(1)(A).

COUNT TWO

(Manufacturing and Dealing Firearms Without Paying Required Tax)

From in or about 2021 to on or about March 1, 2022, in Mecklenburg County, within the Western District of North Carolina, the defendant,

DESMON TAYLOR MOORE,

knowingly engaged in the business of manufacturing and dealing in firearms without having paid the special occupational tax required by Title 26, United States Code, Section 5801; in violation of Title 26, United States Code, Section 5861(a).

COUNT THREE

(Transfer and Possession of a Machinegun)

On or about October 5, 2021, in Mecklenburg County, within the Western District of North Carolina, the defendant,

DESMON TAYLOR MOORE,

aiding and abetting another, knowingly and willfully possessed and transferred a machinegun, as that term is defined in Title 18, United States Code, Section 921(a)(23), to wit: a Good Time Outdoors, model Core 15, 5.56 caliber pistol. All in violation of Title 18, United States Code, Section 922(o).

COUNT FOUR

(Possession of a Firearm Not Registered in the National Firearms Registration and Transfer Record)

On or about October 5, 2021, in Mecklenburg County, within the Western District of North Carolina, the defendant,

DESMON TAYLOR MOORE,

knowingly and unlawfully possessed a firearm as defined by 26 U.S.C. § 5845, to wit: a Good Time Outdoors, model Core 15, 5.56 caliber pistol machinegun not registered to him in the National Firearms Registration and Transfer Record, in violation of Title 26, United States Code, Sections 5841 and 5861(d).

COUNT FIVE

(Transfer and Possession of a Machinegun)

On or about November 4, 2021, in Mecklenburg County, within the Western District of North Carolina, the defendant,

DESMON TAYLOR MOORE,

aiding and abetting another, knowingly and willfully possessed and transferred a machinegun, as that term is defined in Title 18, United States Code, Section 921(a)(23), to wit: a machinegun conversion kit, commonly referred to as a Glock Switch. All in violation of Title 18, United States Code, Section 922(o).

COUNT SIX

(Possession of a Firearm Not Registered in the National Firearms Registration and Transfer Record)

On or about November 4, 2021, in Mecklenburg County, within the Western District of North Carolina, the defendant,

DESMON TAYLOR MOORE,

knowingly and unlawfully possessed a firearm as defined by 26 U.S.C. § 5845, to wit: a machinegun conversion kit, commonly referred to as a Glock Switch, not registered to him in the National Firearms Registration and Transfer Record, in violation of Title 26, United States Code, Sections 5841 and 5861(d).

COUNT SEVEN

(Transfer and Possession of a Machinegun)

On or about November 18, 2021, in Mecklenburg County, within the Western District of North Carolina, the defendant,

DESMON TAYLOR MOORE,

knowingly and willfully possessed and transferred a machinegun, as that term is defined in Title 18, United States Code, Section 921(a)(23), to wit: a Glock, model 19, 9mm caliber pistol with an affixed machinegun conversion kit, commonly referred to as a Glock Switch. All in violation of Title 18, United States Code, Section 922(o).

COUNT EIGHT

(Possession of a Firearm Not Registered in the National Firearms Registration and Transfer Record)

On or about November 18, 2021, in Mecklenburg County, within the Western District of North Carolina, the defendant,

DESMON TAYLOR MOORE,

knowingly and unlawfully possessed a firearm as defined by 26 U.S.C. § 5845, to wit: a Glock, model 19, 9mm caliber pistol with an affixed machinegun conversion kit, commonly referred to as a Glock Switch, a machinegun not registered to him in the National Firearms Registration and Transfer Record, in violation of Title 26, United States Code, Sections 5841 and 5861(d).

COUNT NINE

(Transfer and Possession of a Machinegun)

On or about December 3, 2021, in Mecklenburg County, within the Western District of North Carolina, the defendant,

DESMON TAYLOR MOORE,

knowingly and willfully possessed and transferred a machinegun, as that term is defined in Title 18, United States Code, Section 921(a)(23), to wit: a machinegun conversion kit, commonly referred to as a Glock Switch. All in violation of Title 18, United States Code, Section 922(o).

COUNT TEN

(Possession of a Firearm Not Registered in the National Firearms Registration and Transfer Record)

On or about December 3, 2021, in Mecklenburg County, within the Western District of North Carolina, the defendant,

DESMON TAYLOR MOORE,

knowingly and unlawfully possessed a firearm as defined by 26 U.S.C. § 5845, to wit: a machinegun conversion kit, commonly referred to as a Glock Switch, a machinegun not registered to him in the National Firearms Registration and Transfer Record, in violation of Title 26, United States Code, Sections 5841 and 5861(d).

COUNT ELEVEN

(Transfer and Possession of a Machinegun)

On or about December 16, 2021, in Mecklenburg County, within the Western District of North Carolina, the defendant,

DESMON TAYLOR MOORE,

knowingly and willfully possessed and transferred one or more machineguns, as that term is defined in Title 18, United States Code, Section 921(a)(23), to wit: a Jacob Grey, model JG15, 5.56 caliber pistol bearing serial number JG21200 and a Jacob Grey, model JG15, 5.56 caliber pistol bearing serial number JG21141. All in violation of Title 18, United States Code, Section 922(o).

COUNT TWELVE

(Possession of a Firearm Not Registered in the National Firearms Registration and Transfer Record)

On or about December 16, 2021, in Mecklenburg County, within the Western District of North Carolina, the defendant,

DESMON TAYLOR MOORE,

knowingly and unlawfully possessed one or more firearms as defined by 26 U.S.C. § 5845, to wit: a Jacob Grey, model JG15, 5.56 caliber pistol bearing serial number JG21200 and a Jacob Grey, model JG15, 5.56 caliber pistol bearing serial number JG21141, machineguns not registered to him in the National Firearms Registration and Transfer Record, in violation of Title 26, United States Code, Sections 5841 and 5861(d).

COUNT THIRTEEN

(Transfer and Possession of a Machinegun)

On or about January 26, 2022, in Mecklenburg County, within the Western District of North Carolina, the defendant,

DESMON TAYLOR MOORE,

knowingly and willfully possessed and transferred a machinegun, as that term is defined in Title 18, United States Code, Section 921(a)(23), to wit: a privately-made firearm, 9mm caliber pistol, with an affixed machinegun conversion kit, commonly referred to as a Glock Switch. All in violation of Title 18, United States Code, Section 922(o).

COUNT FOURTEEN

(Possession of a Firearm Not Registered in the National Firearms Registration and Transfer Record)

On or about January 26, 2022, in Mecklenburg County, within the Western District of North Carolina, the defendant,

DESMON TAYLOR MOORE,

knowingly and unlawfully possessed one or more firearms as defined by 26 U.S.C. § 5845, that is a silencer, as that term is further defined by 18 U.S.C. § 921(a)(24), and a privately-made firearm, 9mm caliber pistol with an affixed machinegun conversion kit, commonly referred to as a Glock Switch, a machinegun; both not registered to him in the National Firearms Registration and Transfer Record, in violation of Title 26, United States Code, Sections 5841 and 5861(d).

COUNT FIFTEEN

(Possession of a Machinegun)

On or about January 31, 2022, in Mecklenburg County, within the Western District of North Carolina, the defendant,

DESMON TAYLOR MOORE,

knowingly and willfully possessed one or more machineguns, as that term is defined in Title 18, United States Code, Section 921(a)(23), to wit: three machine gun conversion devices manufactured by Wide Open Trigger. All in violation of Title 18, United States Code, Section 922(o).

COUNT SIXTEEN

(Possession of a Firearm Not Registered in the National Firearms Registration and Transfer Record)

On or about January 31, 2022, in Mecklenburg County, within the Western District of North Carolina, the defendant,

DESMON TAYLOR MOORE,

knowingly and unlawfully possessed one or more firearms as defined by 26 U.S.C. § 5845, to wit: three machinegun conversion devices manufactured by Wide Open Trigger, machineguns not registered to him in the National Firearms Registration and Transfer Record, in violation of Title 26, United States Code, Sections 5841 and 5861(d).

COUNT SEVENTEEN

(Transfer and Possession of a Machinegun)

On or about March 1, 2022, in Mecklenburg County, within the Western District of North Carolina, the defendant,

DESMON TAYLOR MOORE,

knowingly and willfully possessed and transferred a machinegun, as that term is defined in Title 18, United States Code, Section 921(a)(23), to wit: a Glock, model 17, 9mm caliber pistol with an affixed machinegun conversion kit, commonly referred to as a Glock Switch. All in violation of Title 18, United States Code, Section 922(o).

COUNT EIGHTEEN

(Possession of a Firearm Not Registered in the National Firearms Registration and Transfer Record)

On or about March 1, 2022, in Mecklenburg County, within the Western District of North Carolina, the defendant,

DESMON TAYLOR MOORE,

knowingly and unlawfully possessed one or more firearms as defined by 26 U.S.C. § 5845, to wit: a Glock, model 17, 9mm caliber pistol with an affixed machinegun conversion kit, commonly referred to as a Glock Switch, a machinegun not registered to him in the National Firearms Registration and Transfer Record, in violation of Title 26, United States Code, Sections 5841 and 5861(d).

NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE

Notice is hereby given of the provisions of 18 U.S.C. § 924(d), 26 U.S.C. § 5872, 28 U.S.C. § 2461(c) and the statutes incorporated or referred to therein. The firearms and ammunition listed below are subject to forfeiture in accordance with §§ 924(d), 5872, and/or 2461 because they were involved in, used, or intended to be used in the violations alleged in this bill of indictment.

The Grand Jury finds probable cause to believe that the following properties are subject to forfeiture on one or more of the grounds stated above:

- a. a Good Time Outdoors, model Core 15, 5.56 caliber pistol, seized October 5, 2021;
- b. a machinegun conversion kit, commonly referred to as Glock Switch, seized November 4, 2021;
- c. a Glock, model 19, 9mm caliber pistol, and a Smith and Wesson, model M&P 40, .40 caliber pistol, seized November 18, 2021;
- d. a machinegun conversion kit, commonly referred to as a Glock Switch, seized December 3, 2021;
- e. two Jacob Grey, model JG15, 5.56 caliber pistols, seized December 16, 2021;
- f. one privately-made 9mm caliber pistol and one privately-made 9mm caliber pistol with affixed Glock Switch and Silencer, seized January 26, 2022;
- g. two silencers, seven machine gun conversion kits commonly referred to as Glock Switches, three machine gun conversion devices manufactured by Wide Open Trigger, a Taurus, model G2c, 9mm pistol, two Romarm/Cugir, Micro Draco, 7.62 caliber pistols, a Glock frame, a Jacob Grey, JG15 frame, a Glock, model 19, 9mm caliber pistol, a FNH, Scar 20S,

7.62 caliber rifle, a Panzer, model BP12, 12 gauge shotgun, a Glock, model 27, .40 caliber pistol, a Glock, model 27, .40 caliber pistol, a Glock, model 22, .40 caliber pistol, a Black Aces Tactical, Pro Series S, 12 gauge firearm/shotgun, a Glock, model 26, 9mm pistol, a Glock, model 19, 9mm pistol, a Glock, model 23, .40 caliber pistol, a Glock, model 45, 9mm pistol, and a Glock, model 45, 9mm pistol, seized on January 31, 2022; and

h. a Glock, model 17, 9mm caliber pistol, seized March 1, 2022.

A TRUE BILL

FOREPERSON

DENA J. KING
UNITED STATES ATTORNEY



DAVID W. KELLY
ASSISTANT UNITED STATES ATTORNEY